

IN THE MATTER OF THE SEARCH OF ) Case No. 2:25-cr-803  
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 )  
THE CELLULAR DEVICE AS PARTICULARLY )  
DESCRIBED IN THE AFFIDAVIT OF DEA TFO )  
JASON JARRELL DATED JUNE 17, 2025 )

The United States of America, by and through its undersigned Assistant United States Attorney, hereby moves this Court to seal the affidavit in support of the search warrant and the attachments thereto, as well as the return to the warrant identifying any evidence seized. The Court has the inherent authority to seal these documents. *See Baltimore Sun v. Goetz*, 886 F. 2d 60 (4th Cir. 1988). The purpose of the Government's request is to protect the information contained within these documents and to avoid the disclosure of the investigation at this time.

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ongoing active federal criminal investigation. Evidence gathered from this search warrant will likely lead to other individuals involved in the alleged criminal activity under investigation. Sealing this search warrant and associated documents will prevent this ongoing active federal criminal investigation from becoming widespread public knowledge which could lead to the destruction of relevant evidence. Premature disclosure of the contents of this affidavit, attachments, and search warrant return may have a significant and negative impact on the continuing federal investigation and may severely jeopardize its effectiveness. Additionally, sealing this search warrant affidavit with associated attachments will benefit officer safety. There will be a multi-day delay between search warrant authorization and search warrant execution. Sealing will prevent individuals associated with the investigation from learning of the warrant and possibly taking proactive measures in anticipation of law enforcement's arrival to execute the warrant.

For these reasons, the Government submits that the interests in sealing the affidavit and attachments thereto and the return outweigh the common-law public right of access and that sealing is "essential to preserve higher values." *See Media Gen. Operations, Inc. v. Buchanan*, 417 F.3d 424, 429-31 (4th Cir. 2005). The Government further submits that, by sealing only the affidavit in support of the search warrant, attachments thereto, and the return while providing public access to the search warrant, the application in support of the search warrant, the motion to seal and the sealing order, the denial of access is narrowly tailored to serve the Government's interests in sealing. *Id.* at 429.

Based on the foregoing, the Government requests that the affidavit in support of the search warrant and attachments thereto, as well as the return, be filed under seal except that working copies should be made available to the United States Attorney's Office, the Drug Enforcement

Administration (DEA), and any other law enforcement agency designated by the United States Attorney's Office.

Respectfully Submitted,

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